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16 UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 WAYMO LLC,

Case No. 3:17-cv-00939-WHA

21 Plaintiff,

**DECLARATION OF THOMAS J.
PARDINI IN SUPPORT OF
PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL ITS MOTION TO
EXCLUDE DEFENDANTS'
DAMAGES EXPERT
WALTER BRATIC (DKT. 2275)**

22 v.

23 UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

24 Defendants.

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1 I, Thomas J. Pardini, declare as follows:

2 1. I am a member of the Bar of the State of California and an attorney at the law firm
 3 of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal
 4 knowledge and if called as a witness, I could and would competently testify to the matters set
 5 forth herein. I make this declaration in support of Plaintiff Waymo LLC's Administrative Motion
 6 to File Under Seal Its Motion to Exclude Defendants' Damages Expert Walter Bratic (Dkt. 2275).

7 2. I have reviewed the following documents and confirmed that only the portions
 8 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Exhibit 2 to Waymo's Motion	Entire Document

12 3. Exhibit 2 to Waymo's Motion is an expert report containing highly confidential
 13 information regarding Uber's financial forecasts, market assumptions, development timeline
 14 estimates, and strategic business considerations. It also contains internal company presentations
 15 and documents regarding this same highly confidential information, including business operating
 16 details and pricing strategy. In addition, Exhibit 2 contains highly confidential information
 17 regarding a business agreement, including specific financial and commercial terms of the
 18 agreement. I understand that disclosure of this information could allow competitors to acquire
 19 insight into detailed information about Uber's business strategy, internal market assumptions,
 20 finances, technical development, business agreements, and development timeline, allowing
 21 competitors to tailor their own business strategy to the detriment of Uber.

22 4. Defendants' request to seal is narrowly tailored to the portions of Waymo's
 23 Motion and supporting exhibits that merit sealing.

24 I declare under penalty of perjury that the foregoing is true and correct. Executed this 1st
 25 day of December, 2017 at San Francisco, California.

26 */s/ Thomas J. Pardini*
 27 Thomas J. Pardini
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